

Atlantic Richfield Company

Anthony R. Brown
Project Manager, Mining

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December 16, 2011

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Mr. Steve Way
US EPA Region 8
Emergency Response Program (8EPR-SA)
1595 Wynkoop Street
Denver, Colorado 80202-1129

**RE: Rico Argentine Site
Unilateral Administrative Order for Removal Action ("UAO")
Docket No. CERCLA-08-2011-0005
Confirmation of Schedule Modifications**

Dear Mr. Way:

EPA and Atlantic Richfield Company have had recent discussions concerning the scheduling of certain tasks identified in the Removal Action Work Plan attached to the above-referenced Unilateral Administrative Order (the "UAO") for the Rico-Argentine Site. In my December 7, 2011 letter to you, I committed to submitting a revised Work Plan schedule on or before December 16, 2011. The purpose of today's letter is to formally transmit the revised schedule and request EPA's written approval of the proposed modifications in accordance with Section XV of the UAO.

The enclosed "Updated Schedule" replaces Section 8.0 of the Removal Action Work Plan. Task descriptions are generally consistent with those in the original schedule, although a few new tasks have been added, and some descriptions have been modified slightly based on information learned during the performance of field activities in 2011. Completion dates have been adjusted to reflect our recent discussions and to a

allow additional time to perform critical investigations before commencing with the design and construction of the solids repository and treatment system. Where tasks have been completed already, this is noted in the Updated Schedule.

Atlantic Richfield believes the Updated Schedule fully comports with our recent discussions with EPA. In light of the solids removal work and pond stability improvements completed in 2011 and scheduled for the first half of 2012, the revised completion deadlines should not impose any additional threat to public health or the environment or diminish the protectiveness of the removal action. Moreover, these changes will help to ensure that a technically sound and reasonable approach is followed as the removal action proceeds.

Thank you for attention to this request. If you have any questions or comments, please feel free to contact me at (714) 228-6770 or via e-mail at Anthony.Brown@bp.com.

A BP affiliated company



Steve Way
December 15, 2011
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Sincerely,



Tony Brown
Project Manager

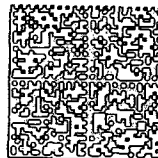
Enclosure (Updated Schedule, Work Plan Section 8.0)

cc: Ronald Halsey, Atlantic Richfield Company
 Terry Moore, Atlantic Richfield Company
 Sheila D'Cruz, Esq., Atlantic Richfield Company
 Adam Cohen, Esq., Davis Graham & Stubbs LLP
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